

**REMARKS****Summary of the Office Action**

Claims 1 and 15 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sasuga et al. (US 5,680,183) in view of Onoda et al. (US 5,886,874).

Claim 16 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sasuga et al., Onoda et al., and Okazaki et al. (US 5,656,847).

Claims 2-14 and 17-20 are not explicitly rejected over the art of record.

**Summary of the Response to the Office Action**

Applicant has amended claims 1-4, 8-11, 15, and 17 to further define the invention, and canceled claim 16. Accordingly, claims 1-15 and 17-20 are pending for further consideration.

**Request for Personal Interview**

Applicant respectfully requests a personal interview with the Examiner before the Examiner begins examination of the RCE application for purposes of advancing prosecution of the RCE application. Accordingly, Applicant's undersigned representative requests to be contacted in order to arrange a mutually agreeable time period with which to conduct the interview.

**All Claims Define Allowable Subject Matter**

Claims 1 and 15 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sasuga et al. (US 5,680,183) in view of Onoda et al. (US 5,886,874) and claim 16 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sasuga et al., Onoda et al., and Okazaki et al. (US 5,656,847). Applicant traverses these rejections for the following reasons.

Initially, Applicant respectfully notes that the above rejections do not allege that any of dependent claims 2-14, 17, 19, and 20 are obvious in view of Sasuga et al., Onoda et al., and/or Okazaki et al. Furthermore, Applicant respectfully notes that none of the features recited by claims 2-14, 17, 19, and 20 have been identified in the above rejections as being taught or suggested by any of Sasuga et al., Onoda et al., and/or Okazaki et al.

Accordingly, Applicant respectfully requests that every limitation of dependent claims 2-14 and 17-20 be clearly addressed in any subsequent Office Action on the merits.

Applicant respectfully traverses the rejections as being based upon a combination of Sasuga et al., Onoda et al., and Okazaki et al. that neither teaches nor suggests the novel combination of features recited in amended independent claims 1 and 15.

With respect to amended independent claim 1, Sasuga et al. and Onoda et al., whether taken singly or combined, do not teach or suggest a liquid crystal display module that includes source and control printed circuit boards "laterally spaced apart from each other along a horizontal direction." Similarly, Sasuga et al. and Onoda et al., whether taken singly or combined, do not teach or suggest a liquid crystal display device that includes "at least one control printed circuit board laterally spaced apart from the at least one source printed circuit board along a horizontal direction," and "the control printed circuit board is removable from the source printed circuit board," as recited by amended independent claim 15.

In contrast to Applicant's claimed invention, Sasuga et al. teaches, in FIGs. 23 and 31 and at col. 21, lines 14-29, first and second drive circuit substrates PCB1 and PCB2, wherein the first drive circuit substrate PCB1 is placed and held vertically on top of the second drive circuit substrate PCB2. Accordingly, Sasuga et al. teaches that the first and second drive circuit substrates PCB1 and PCB2 are positioned directly on top of each other along a vertical

direction. Thus, Sasuga et al. fails to disclose source and control printed circuit boards that are "laterally spaced apart from each other along a horizontal direction," as recited by independent claims 1 and 15, as amended.

Furthermore, Applicant asserts that the Office Action does not rely on Onoda et al. and/or Okaski et al. to provide motivation to modify Sasuga et al. to achieve the claimed invention. Moreover, Applicant respectfully asserts that Onoda et al. and/or Okaski et al. cannot provide proper motivation to modify Sasuga et al. to achieve the claimed invention.

The Office Action asserts that "[w]hile Onoda concerns reducing the thickness of an IC card, a main goal of LCD technology is to manufacture thinner displays." Thus, the Office Action concludes that "the motivation, teaching, and suggestion of Onoda is directly applicable to LCD technology." Applicant respectfully disagrees.

Applicant respectfully asserts that the alleged motivation that "a main goal of LCD technology is to manufacture thinner displays" is without any evidentiary support. M.P.E.P. § 2144.03E instructs that "[I]t is never appropriate to rely solely on common knowledge in the art without evidentiary support in the record as the principal evidence upon which a rejection was based." Accordingly, since none of the prior art references of record teach, suggest, imply, or discuss that "a main goal of LCD technology is to manufacture thinner displays," the Office Action fails to establish a *prima facie* case of obviousness with respect to claims 1 and 15.

Moreover, Applicant respectfully asserts that the Office Action's conclusion that "the motivation, teaching, and suggestion of Onoda is directly applicable to LCD technology" lacks any suggestion to combine the teachings of Sasuga et al. and Onoda et al. M.P.E.P. 2143.01 instructs that "[t]he mere fact that references can be combined or modified does not

render the resultant combination obvious unless the prior art also suggests the desirability of the combination,” and “because the references relied upon teach that all aspects of the claimed invention were individually known in the art is not sufficient to establish a *prima facie* case of obviousness without some objective reason to combine the teachings of the references.”

Accordingly, since Onoda et al. does not provide **any** teaching, suggestion, or motivation to combine or modify the teachings of Sasuga et al., Applicant respectfully asserts that the Office Action has not established a *prima facie* case of obviousness.

For at least the above reasons, Applicant respectfully submits that claims 1-20 are neither taught nor suggested by Sasuga et al., Onoda et al., and Okazaki et al., whether taken alone or in combination. Applicant respectfully asserts that the rejections under 35 U.S.C. §103 should be withdrawn because the above-discussed novel features are neither taught nor suggested by either of Sasuga et al., Onoda et al., and Okazaki et al., whether taken alone or in combination.

### **CONCLUSION**

In view of the foregoing, Applicant respectfully requests reconsideration and the timely allowance of all pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of

time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested, and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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